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T.R.A. DOCKET ROOM

December 22, 2003

Kim Beals, Counsel
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

Re: Application of Better World Telecom, LLC for Authority to Provide
Resold Telecommunications Services in Tennessee
Docket No. 03-00542

Dear Kim:

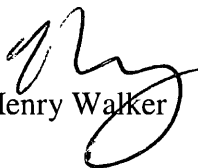
Enclosed for filing are the supplemental responses of BetterWorld to the Staff's data request and a Small and Minority-Owned Telecommunications Business Participation Plan.

The company is awaiting the return of the surety bond so that it can be notarized and re-filed at the TRA. Unfortunately, the Staff sent the bond by regular mail and, because of the holiday season, mail delivery has been delayed.

Very truly yours,

BOULT, CUMMINGS, CONNERS & BERRY, PLC

By:


Henry Walker

HW/pp

Cc: Eddie Roberson

Question: How does the company intend to comply with TCA § 65-21-114? In its description, please explain technically how the company will not bill for countywide calls within Tennessee?

Response: As an IXC reseller, BetterWorld must depend upon its underlying wholesale carrier, Global Crossing, to comply with T.C.A. § 65-21-114. The statute, as applied to BetterWorld, is apparently unenforceable, according to the Tennessee Attorney General. BetterWorld, however, commits to follow industry standard guidelines in implementing the county-wide calling requirement to the extent BetterWorld, as a reseller, is able to do so.

Question: Provide a statement from the parent company, BetterWorld Telecom, Inc. stating and certifying the amount of financial support to be contributed.

Response: The parent company is strictly a holding company and is not in a position to offer financial support.

BetterWorld Telecom, LLC

SMALL AND MINORITY-OWNED TELECOMMUNICATIONS
BUSINESS PARTICIPATION PLAN

SMALL AND MINORITY-OWNED TELECOMMUNICATIONS BUSINESS PARTICIPATION PLAN

Pursuant to T.C.A. §65-5-212, as amended, BetterWorld Telecom, LLC (“Better World”) submits this Small and Minority-Owned Telecommunications Business Participation Plan (the “Plan”) along with its Application for a Certificate of Public Convenience and Necessity to resell intrastate and local exchange services in Tennessee.

I. PURPOSE

The purpose of §65-5-212 is to provide opportunities for small and minority-owned businesses to provide goods and services to Telecommunications service providers. BetterWorld is committed to the goals of §65-5-212 and to taking steps to support the participation of small and minority-owned Telecommunications businesses in the Telecommunications industry. BetterWorld will endeavor to provide opportunities for small and minority-owned Telecommunications businesses to compete for contracts and subcontracts for goods and services. As part of its procurement process, BetterWorld will make efforts to identify and inform minority-owned and small businesses that are qualified and capable of providing goods and services to BetterWorld of such opportunities.

BetterWorld’s representatives have already contacted the Department of Economic and Community Development, the administrator of the small and minority-owned Telecommunications assistance program, to obtain a list of qualified vendors. Moreover, BetterWorld will seek to increase awareness of such opportunities so that companies not otherwise identified will have sufficient information to participate in the procurement process.

II. DEFINITIONS

As defined in §65-5-212:

Minority-Owned Business. Minority-owned business shall mean a business which is solely owned, or at least fifty-one percent (51%) of the assets or outstanding stock of which is owned, by an individual who personally manages and controls daily operations of such business, and who is impeded from normal entry into the economic mainstream because of race, religion, sex or national origin and such business has annual gross receipts of less than four million dollars.

Small Business. Small Business shall mean a business with annual gross receipt of less than four million dollars (\$4,000,000).

III. ADMINISTRATION

BetterWorld's Plan will be overseen and administered by the individual named below, hereinafter referred to as the Administrator, who will be responsible for carrying out and promoting BetterWorld's full efforts to provide equal opportunities for small and minority-owned businesses. The Administrator of the Plan will be:

Laura Henley
Controller, HR Manager
BetterWorld Telecom, LLC
11951 Freedom Drive, 13th Fl
Reston, VA 20190
Voice: (703) 251-4844
Fax: (703) 251-4744

The Administrator's responsibilities will include:

(1) Maintaining an updated Plan in full compliance with §65-5-212 and the rules and orders of the Tennessee Regulatory Authority.

(2) Establishing and developing policies and procedures necessary for the successful implementation of the Plan.

(3) Preparing and submitting such forms as may be required by the Tennessee

Regulatory Authority, including the filing of required annual updates.

(4) Serving as the primary liaison to and cooperating with the Tennessee Regulatory Authority, other agencies of the State of Tennessee, and small and minority-owned businesses to locate and use qualified small and minority-owned businesses as defined in §65-5-212.

(5) Searching for and developing opportunities to use small and minority-owned businesses and encouraging such businesses to participate in and bid on contracts and subcontracts.

(6) Providing records and reports and cooperate in any authorized surveys as required by the Tennessee Regulatory Authority.

(7) Establishing a record-keeping system to track qualified small and minority-owned businesses and efforts to use such businesses.

(8) Providing information and educational activities to persons within BetterWorld and training such persons to seek out, encourage, and promote the use of small and minority-owned businesses.

In performance of these duties, the Administrator will utilize a number of resources, including:

Chambers of Commerce

The Tennessee Department of Economic and Community Development

The United States Department of Commerce

Small Business Administration

Office of Minority Business

The National Minority Supplier Development Counsel

The National Association of Women Business Owners

The National Association of Minority Contractors

Historically Black Colleges, Universities, and Minority Institutions


The efforts to promote and ensure equal opportunities for small and minority-owned businesses are primarily spelled out in the Administrator's duties above. Additional efforts to provide opportunities to small and minority-owned businesses will include offering, where appropriate and feasible, small and minority-owned businesses assistance with technical, insurance, bonding, licensing, production, and deadline requirements.

IV. RECORDS AND COMPLIANCE REPORTS

BetterWorld will maintain records of qualified small and minority-owned business and efforts to use the goods and services of such businesses. In addition, BetterWorld will maintain records of educational and training activities conducted or attended and of the internal procurement procedures adopted to support this plan.

BetterWorld will submit records and reports required by the Tennessee Regulatory Authority concerning the Plan. Moreover, BetterWorld will cooperate fully with any surveys and studies required by the Tennessee Regulatory Authority.

BetterWorld Telecom, LLC

By: 

Laura Henley

Controller, HR Manager

Dated: December 22, 2003